

**Commonwealth of Kentucky  
Energy and Environment Cabinet  
Department for Environmental Protection  
Division for Air Quality  
200 Fair Oaks Lane, 1<sup>st</sup> Floor  
Frankfort, Kentucky 40601  
(502) 564-3999**

**Draft**

**AIR QUALITY PERMIT  
Issued under 401 KAR 52:030**

**Permittee Name:** The United States Playing Card Company  
**Mailing Address:** 4590 Beech Street, Cincinnati, OH 45212

**Source Name:** The United States Playing Card Company  
**Mailing Address:** 300 Gap Way  
Erlanger, KY 41018

**Source Location:** Same as above

**Permit ID:** F-09-007  
**Agency Interest #:** 47208  
**Activity ID:** APE20090001  
**Review Type:** Conditional Major / Synthetic Minor,  
Construction / Operating  
**Source ID:** 21-015-00166

**Regional Office:** Florence Regional Office  
8020 Veterans Memorial Drive, Suite 110  
Florence, KY 41042  
(859) 525-4923

**County:** Boone

**Application**  
**Complete Date:** March 20, 2009  
**Issuance Date:** XXXXXX 2009  
**Revision Date:**  
**Expiration Date:** XXXXXX 2014

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**John S. Lyons, Director  
Division for Air Quality**

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	Permit type	Activity#	Complete Date	Issuance Date	Summary of Action
<b>F-09-007</b>	<b>Initial</b>	<b>APE20090001</b>	<b>3/20/09</b>		<b>Initial Construction/Operating Permit</b>

## **SECTION A - PERMIT AUTHORIZATION**

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:030, Federally-enforceable permits for non-major sources.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS****01 Press #30 Goss Lithographic Heat-set Offset Web Press (EP01)**Description:

Six (6) perfecting printing units with a perfecting coater

Maximum of 14 applicators – 12 for ink and 2 for coating, single pass

Stack EP01, exhaust to roof, 3826 scfm

Controls: Afterburner (integral part of the dryer)

Construction date: projected April 2009

MP01	Ink
MP02	Fountain solution
MP03	Blanket roller wash
MP04	Nicoat Coating
MP05	Ecotherm 173-1020 dryer with afterburner: 5.6 mmBTU/hr

**APPLICABLE REGULATIONS:**

401 KAR 59:210, *New Fabric, Vinyl and Paper Surface Coating Operations*, applicable to each affected facility commenced on or after June 29, 1979 and located in a county or portion of a county designated as nonattainment for ozone in 401 KAR 51:010. This regulation applies to Nicoat Coating, MP04.

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.

**1. Operating Limitations**

For MP04, the VOC content of the coating must be less than 2.9 lb/gal, excluding water or exempt solvent or both, delivered to the applicators associated with the coating line, to be exempt from Section 3 of 401 KAR 59:210.

**Compliance Demonstration Method:** See Section B(5): Specific Recordkeeping Requirements below.

**2. Emissions Limitations**

A. Source-wide emissions of VOCs shall not exceed 25 tons per rolling twelve-month period.

**Compliance Demonstration Method:** See Section D.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

- B. Pursuant to 401 KAR 63:020, no owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants.

**Compliance Demonstration Method:** The source is in compliance with 401 KAR 63:020 based on the rates of emissions of airborne toxics provided in the application submitted by the source. If the source alters processes, process rates, material formulations, or any other factor that would result in increased emissions of these previously evaluated airborne toxics, or the emission of airborne toxics not previously evaluated by the Division, the source shall submit the appropriate application forms.

**3. Testing Requirements**

- A. Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.
- B. See also Section E.

**4. Specific Monitoring Requirements**

See Section E.

**5. Specific Recordkeeping Requirements**

- A. Per 401 KAR 59:210 Section 4(8), daily records shall be maintained for the most recent two (2) year period, for MP04. These records shall be made available to the cabinet or the U.S. EPA upon request. The records shall include, but not be limited to, the following:
1. Applicable administrative regulation number;
  2. Application method and substrate type;
  3. Amount and type of adhesive, coating (including catalyst and reducer for multi-component coatings), or solvent used at each point of application, including exempt compounds;
  4. The VOC content as applied in each adhesive, coating, or solvent;
  5. The date for each application for adhesive, coating, or solvent;
  6. The amount of surface preparation, cleanup, or wash-up solvent (including exempt compounds) used and the VOC content of each.
- B. See also Section D and Section E.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**6. Specific Reporting Requirements**

See Sections D and E.

**7. Specific Control Equipment Operating Conditions:**

See Section E.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****02 USPC Press #26 (EP02 & EP03)**Description:

Heidelberg XL 75 lithographic sheet-fed printing press

Six (6) colors with coater and IR dryer

Maximum web width of 30"

Stack EP02 (post-dryer), exhaust to roof, 3500 cfm

Stack EP03 (pre-dryer), exhaust to roof, 1825 cfm

Controls: No VOC/HAP controls; exhaust and air filtration systems controls for PM

Construction date: projected April 2009

MP01	Ink
MP02	Fountain solution
MP03	Solvent
MP04	N-310 Blanket wash
MP05	Nicoat
MP06	Electric IR Dryer
MP07	Anti off-set spray powder

**APPLICABLE REGULATIONS:**

401 KAR 59:010, *New Process Operations*, applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates, commenced on or after July 2, 1975. This regulation applies to the anti off-set spray powder, MP07.

401 KAR 59:210, *New Fabric, Vinyl and Paper Surface Coating Operations*, applicable to each affected facility commenced on or after June 29, 1979 and located in a county or portion of a county designated as nonattainment for ozone in 401 KAR 51:010. This regulation applies to Nicoat, MP05.

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.

**1. Operating Limitations**

For MP05, the VOC content of the coating must be less than 2.9 lb/gal, excluding water or exempt solvent or both, delivered to the applicators associated with the coating line, to be exempt from Section 3 of 401 KAR 59:210.

**Compliance Demonstration Method:** See Section B(5): Specific Recordkeeping Requirements below.

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****2. Emissions Limitations**

- A. Source-wide emissions of VOCs shall not exceed 25 tons per rolling twelve-month period.

**Compliance Demonstration Method:** See Section D.

- B. 401 KAR 59:010, Section 3(1)(a) limits visible emissions from each control device or stack to less than 20% opacity.

**Compliance Demonstration Method:** Compliance with the opacity standard shall be determined by the permittee performing a qualitative visual observation of the opacity of emissions at the roof monitor no less than weekly and maintaining a log of the observations. If visible emissions from the roof monitor are seen (not including condensed water in the plume), then an inspection of control equipment shall be initiated and corrective action taken. If visible emissions are present after the corrective action, the process shall be shut down and shall not operate again until repairs have been made that result in no visible emissions from the process during operation. In lieu of shutting the process down, the permittee may determine the opacity using Reference Method 9. If the opacity limit is not exceeded, the process may continue to operate.

- C. 401 KAR 59:010, Section 3(2), particulate emissions shall not equal or exceed the emission rate determined by the following equation:

$$E = 3.59 \times P^{0.62}$$

Where;        E = Emission rate in pounds per hour  
                  P = Process weight rate (tons/hr.)

For processing rates of 1000 lbs/hr or less, the allowable emission rate is 2.34 lbs/hr.

**Compliance Demonstration Method:** The permittee is considered to be in compliance with the limitation above when the exhaust system, the air filter system, and the exhaust stack are functioning and in good working order.

- D. Pursuant to 401 KAR 63:020, no owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants.

**Compliance Demonstration Method:** The source is in compliance with 401 KAR 63:020 based on the rates of emissions of airborne toxics provided in the application



**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

submitted by the source. If the source alters processes, process rates, material formulations, or any other factor that would result in increased emissions of these previously evaluated airborne toxics, or the emission of airborne toxics not previously evaluated by the Division, the source shall submit the appropriate application forms.

**3. Testing Requirements**

- A. Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.
- B. If the Division requires it, the permittee shall perform a Reference Method 5 test, or other methods approved by the Division, to determine the emission rate of particulate matter. [401 KAR 59:010, 4(1) Test Methods and Procedures]
- C. If the Division requires it, the permittee shall perform a Reference Method 9 test to determine the opacity of continuous emissions. [401 KAR 59:010, 4(5) Test Methods and Procedures]

**4. Specific Monitoring Requirements**

See Section B(7): Specific Control Equipment Operating Conditions below.

**5. Specific Recordkeeping Requirements**

- A. Per 401 KAR 59:210 Section 4(8), daily records shall be maintained for the most recent two (2) year period, for MP05. These records shall be made available to the cabinet or the U.S. EPA upon request. The records shall include, but not be limited to, the following:
  - 1. Applicable administrative regulation number;
  - 2. Application method and substrate type;
  - 3. Amount and type of adhesive, coating (including catalyst and reducer for multi-component coatings), or solvent used at each point of application, including exempt compounds;
  - 4. The VOC content as applied in each adhesive, coating, or solvent;
  - 5. The date for each application for adhesive, coating, or solvent;
  - 6. The amount of surface preparation, cleanup, or wash-up solvent (including exempt compounds) used and the VOC content of each.
- B. The permittee shall maintain a log of the opacity observations for the exhaust system, the air filter system, and the exhaust stack, including the time, date, and identity of the personnel making the record. The permittee shall keep records for routine

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

maintenance and repairs.

C. See also Section D.

**6. Specific Reporting Requirements**

A. Any exceedance in the particulate emissions rate or visible emissions standard specified in this permit shall be reported to the Division as a part of the semiannual reporting required in Section F (5) & (6). The permittee shall submit copies of the relevant information from the control device inspection and repair log for those times when corrective actions are required.

B. See also Section D.

**7. Specific Control Equipment Operating Conditions:**

The exhaust system, the air filter system, and the exhaust stack shall be operational at all times when the printing process is operational.

**8. Alternate Operating Scenarios:**

None

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**03 Laminating Line (EP04 & EP05)**

Description:

Laminating line

Maximum width of 48"

Stack EP04 (pre-dryer), exhaust to roof, 1600 cfm

Stack EP05 (post-dryer), exhaust to roof, 2300 cfm

Hot water clean-up solvent

Controls: No VOC controls

Construction date: projected April 2009

MP01           Aqueous adhesive

MP02           Laminator dryer: 5.72 mmBTU/hr

**APPLICABLE REGULATIONS:**

Not applicable

**1. Operating Limitations**

N/A

**2. Emissions Limitations**

Source-wide emissions of VOCs shall not exceed 25 tons per rolling twelve-month period.

**Compliance Demonstration Method:** See Section D.

**3. Testing Requirements**

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4. Specific Monitoring Requirements**

N/A

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**5. Specific Recordkeeping Requirements**

See Section D.

**6. Specific Reporting Requirements**

See Section D.

**7. Specific Control Equipment Operating Conditions:**

N/A

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**04 Coating Line (EP06)**

Description:

Steinemann Uvimat 86 Coater

Maximum width of 38"

Stack EP06, exhaust to roof, 2470 cfm

Controls: No VOC controls

Construction date: projected April 2009

MP01 Nicoat coating (UV Coating)

MP02 Isopropyl alcohol

MP03 Electric UV dryer

**APPLICABLE REGULATIONS:**

Not applicable

**1. Operating Limitations**

N/A

**2. Emissions Limitations**

Source-wide emissions of VOCs shall not exceed 25 tons per rolling twelve-month period.

**Compliance Demonstration Method:** See Section D.

**3. Testing Requirements**

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4. Specific Monitoring Requirements**

N/A

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**5. Specific Recordkeeping Requirements**

See Section D

**6. Specific Reporting Requirements**

See Section D.

**7. Specific Control Equipment Operating Conditions:**

N/A

## **SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

### **05 Die Cutting Equipment and Finishing Area**

Description:

Die cutting equipment and finishing area

Controls: Trim removal system which consists of dust collector and secondary filter systems

Installation date: projected April 2009

MP01 Die cutting equipment and finishing area (50-65 die cutters)

### **APPLICABLE REGULATIONS:**

401 KAR 59:010, *New Process Operations*, applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates, commenced on or after July 2, 1975.

#### **1. Operating Limitations**

The trim removal system shall be in operation at all times that the die cutting equipment is in operation.

#### **2. Emissions Limitations**

A. 401 KAR 59:010, Section 3(1)(a) limits visible emissions from each control device or stack to less than 20% opacity.

**Compliance Demonstration Method:** Compliance with the opacity standard shall be determined by the permittee performing a qualitative visual observation of the opacity of emissions at the roof monitor no less than weekly and maintaining a log of the observations. If visible emissions from the roof monitor are seen (not including condensed water in the plume), then an inspection of control equipment shall be initiated and corrective action taken. If visible emissions are present after the corrective action, the process shall be shut down and shall not operate again until repairs have been made that result in no visible emissions from the process during operation. In lieu of shutting the process down, the permittee may determine the opacity using Reference Method 9. If the opacity limit is not exceeded, the process may continue to operate.

B. 401 KAR 59:010, Section 3(2), particulate emissions shall not equal or exceed the emission rate determined by the following equation:

**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

$$E = 3.59 \times P^{0.62}$$

Where; E = Emission rate in pounds per hour  
P = Process weight rate (tons/hr.)

For processing rates of 1000 lbs/hr or less, the allowable emission rate is 2.34 lbs/hr.

**Compliance Demonstration Method:** The permittee is considered to be in compliance with the limitation above when the trim removal system is functioning and in good working order. See B(5) Specific Recordkeeping Requirements and B(7) Specific Control Equipment Operating Conditions, below.

**3. Testing Requirements**

- A. Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.
- B. If the Division requires it, the permittee shall perform a Reference Method 5 test, or other methods approved by the Division, to determine the emission rate of particulate matter. [401 KAR 59:010, 4(1) Test Methods and Procedures]
- C. If the Division requires it, the permittee shall perform a Reference Method 9 test to determine the opacity of continuous emissions. [401 KAR 59:010, 4(5) Test Methods and Procedures]

**4. Specific Monitoring Requirements**

See Section B(7): Specific Control Equipment Operating Conditions below.

**5. Specific Recordkeeping Requirements**

The permittee shall maintain a daily log of the pressure drop readings across the dust collector and return air filter systems and opacity observations for the same systems, including the date and identity of the personnel maintaining the log. The permittee shall keep records of routine maintenance and repairs.

**6. Specific Reporting Requirements**

Any exceedance in the particulate emissions rate or visible emissions standard specified in this permit shall be reported to the Division as a part of the semiannual reporting



**SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

required in Section F (5) & (6). The permittee shall submit copies of the relevant information from the control device inspection and repair log for those times when corrective actions are required.

**7. Specific Control Equipment Operating Conditions:**

The trim removal system shall be operational at all times that the die cutting equipment is in operation. Dust collector bags and cartridge filters shall be cleaned / replaced as often as needed to ensure good air pollution control practices. Pressure drop, in accordance with the manufacturer's specifications, shall be monitored daily in order to insure proper operation of the trim removal system at all times.

**8. Alternate Operating Scenarios:**

None

**SECTION C - INSIGNIFICANT ACTIVITIES**

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:030, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to an opacity standard shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspection, evaluation, and any corrective action shall be recorded in a log.

DescriptionGenerally Applicable Regulation

Cold Cleaner Parts Washers (3)

401 KAR 59:185

**SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS**

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.
2. Source-wide Volatile Organic Compound (VOC) emissions shall not exceed 25 tons per year. This annual limitation shall not be exceeded during any consecutive 12-month period for the entire source.

**Compliance Demonstration Methods:**

1. Compliance shall be demonstrated through record keeping and calculation of VOC / HAP emissions from the web press. Use the following equations to determine the VOC / HAP emissions:

- A. The following formula or equivalent may be used in calculating VOC/HAP emissions from ink(s):

Monthly VOC/HAP emitted (lbs) =  $\sum \{ \text{Monthly gallons of ink} \times \text{VOC/HAP content of ink (lbs/gal)} \times 0.8 \times (1 - \text{destruction efficiency of the thermal oxidizer}) \}$ .

- B. The following formula or equivalent may be used in calculating VOC/HAP emissions from the fountain solution(s):

Monthly VOC/HAP emitted (lbs) =  $\sum \{ \text{Monthly gallons of fountain solution} \times \text{VOC/HAP content of fountain solution (lbs/gal)} \times 0.7 \times (1 - \text{destruction efficiency of the thermal oxidizer}) \} + \sum \{ \text{Monthly gallons of fountain solution} \times \text{VOC/HAP content of fountain solution (lbs/gal)} \times 0.3 \}$

- C. The following formula or equivalent may be used in calculating VOC/HAP emissions from the blanket wash(s):

Monthly VOC/HAP emitted (lbs) =  $\sum \{ \text{Monthly gallons of blanket wash} \times \text{VOC/HAP content of blanket wash (lbs/gal)} \times 0.4 \times (1 - \text{destruction efficiency of the thermal oxidizer}) \} + \sum \{ \text{Monthly gallons of blanket wash} \times \text{VOC/HAP content of blanket wash (lbs/gal)} \times 0.6 \}$

- D. The following formula or equivalent may be used in calculating VOC/HAP emission from Nicoat Coating:

Monthly VOC/HAP emitted (lbs) =  $\sum \{ \text{Monthly gallons of Nicoat Coating} \times \text{VOC/HAP content of Nicoat Coating (lbs/gal)} \times 0.7 \times (1 - \text{destruction efficiency of the thermal oxidizer}) \} + \sum \{ \text{Monthly gallons of Nicoat Coating} \times \text{VOC/HAP content of Nicoat Coating (lbs/gal)} \times 0.3 \}$

**SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)**

2. Compliance shall be demonstrated through record keeping and calculation of VOC/ HAP emissions from the sheet fed press, the coating line, and the laminating line. Use the following equation to determine the VOC/HAP emissions:

The following formula or equivalent may be used in calculating VOC/HAP emission from ink, fountain solution, solvent, blanket wash, adhesive, or Nicoat coating:

Monthly VOC/HAP emitted (lbs) =  $\sum \{ \text{Monthly gallons of material} \times \text{VOC/HAP content of material (lbs/gal)} \}$ .

3. Compliance shall be demonstrated through record keeping and calculation of VOC/ HAP emissions from burning natural gas. Use the following equation to determine the VOC/HAP emissions:

The following formula may be used for calculating VOC/HAP emissions from burning natural gas:

Monthly emissions (lbs) = Monthly usage on natural gas (million cubic feet) x 5.5 lb/million cubic feet

4. Compliance with the source-wide VOC emission limit of 25 tons per year shall be demonstrated through record keeping and through the monthly calculation of the total plant-wide VOC emissions.

**2. Specific Record Keeping Requirements:**

- A. Monthly records shall be kept of all materials containing VOCs, including the product type, amount used and VOC percentage (by weight) or the VOC content (in lbs/gal) of all individual VOCs.
- B. Monthly records shall be kept of all materials containing HAPs, including the product type, amount used and weight percentages of all individual HAPs.
- C. The monthly natural gas usage in million cubic feet.
- D. Monthly records shall be kept of all VOC/HAP emissions from burning natural gas.
- E. At the end of each month, VOC and HAP emissions shall be calculated applying equations listed above in this section, and every month, a new 12-month rolling total for VOC and HAP emissions shall be calculated.

## **SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)**

- F. All records shall be retained by the source for a period of five years. These records, as well as purchase orders and invoices for all VOC/HAP containing materials, shall be made available for inspection upon request by any authorized representative of the Division for Air Quality.

### **3. Specific Reporting Requirements:**

- A. Any deviations from requirements of Section B shall be reported. If no such periods occur during a particular quarter, the permittee shall state this in a report to be submitted semiannually.
- B. The following information shall be reported semiannually:
  - a. The VOC emission calculation for each month
  - b. The HAP emission calculation for each month
  - c. The rolling 12-month total for VOC during each month
  - d. The rolling 12-month total for HAP during each month.
  - e. The VOC content of all Nicoat coatings.

## **SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS**

1. Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

### **Press #30 Goss Lithographic Heat-set Off-set Web Press (EP01) - MP05**

Ecotherm 173-1020, EOT01249 Dryer with afterburner

Construction date: projected April 2009

#### **1. Operating Limitations:**

- A. The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature. This average combustion temperature shall be the minimum operating limit of the thermal oxidizer.
- B. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established during the most recent performance test.
- C. The permittee shall use an automatic shutdown system in which the press is stopped when flow is diverted away from the control device to any bypass line when the control device is in operation.
- D. The thermal oxidizer shall be in operation at all times whenever the press is in operation and shall be operated in accordance with standard operating practices based on generally accepted procedures, taking into account manufacturer's recommendations.
- E. The destruction efficiency of the thermal oxidizer shall be that efficiency established during the most recent performance test.

#### **Compliance Demonstration Methods:**

Compliance shall be demonstrated by continuously recording temperature in the combustion chamber at a location in the combustion zone and calculating the 3-hr average operating temperature at 15-minute intervals.

- A. The permittee shall install, calibrate, maintain, and operate in accordance with manufacturer's specifications a temperature-monitoring device equipped with a continuous recorder in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs.
- B. The temperature-monitoring device shall have an accuracy of the greater of 0.75 percent of temperature measure expressed in degrees Celsius or  $\pm 2.5^{\circ}\text{C}$ .

## **SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)**

### **2. Testing Requirements:**

- A. Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.
- B. A performance test shall be conducted to determine the VOC destruction efficiency of the thermal oxidizer in accordance with Section G(4) and G(5) of this permit.

### **3. Specific Monitoring Requirements:**

- A. The permittee shall continuously monitor the combustion temperature during printing and coating operations.
- B. The automatic shutdown system shall be inspected at least once every month to verify that it will detect diversions of flow and would shut down operations in the event of such diversion.

### **4. Specific Recordkeeping Requirements:**

- A. The permittee shall maintain records of the following information for the thermal oxidizer:
  - 1. The design and/or manufacturer's specifications.
  - 2. The operational procedures and preventive maintenance records.
  - 3. The combustion chamber temperature when the thermal oxidizer is in operation.
  - 4. During all periods of operation of the thermal oxidizer in which the 3-hour average combustion chamber temperature of the thermal oxidizer is more than 28°C (50°F) below the average combustion chamber temperature of the thermal oxidizer that was established during the most recent performance test, or during any other malfunctions of the thermal oxidizer.
- B. All records shall be retained at the source for a period of five years.

### **5. Specific Reporting Requirements:**

The permittee shall identify, record, and submit a written report to the Division's Florence Field office of each instance in excess of 3 hours during which the average temperature of the thermal oxidizer used to control emissions from presses remains more than 28°C (50°F) below that at which compliance was demonstrated during the most recent measurement of

**SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS  
(CONTINUED)**

the thermal oxidizer efficiency. If no such periods occur during a particular quarter, the permittee shall state this in a semi-annual report required by Section F(6) of this permit.



## SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b-IV-1 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
  - a. Date, place (as defined in this permit), and time of sampling or measurements;
  - b. Analyses performance dates;
  - c. Company or entity that performed analyses;
  - d. Analytical techniques or methods used;
  - e. Analyses results; and
  - f. Operating conditions during time of sampling or measurement.
2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:030 Section 3(1)(f)1a and Section 1a-7 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26].
3. In accordance with the requirements of 401 KAR 52:030 Section 3(1)f the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
  - a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
  - b. To access and copy any records required by the permit;
  - c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.
4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
5. Summary reports of any monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Sections 1b-V-1 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030, Section 26].

**SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)**

6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:030 Section 22. If continuous emission and opacity monitors are required by regulation or this permit, data shall be reported in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All deviations from permit requirements shall be clearly identified in the reports.
7. In accordance with the provisions of 401 KAR 50:055, Section 1 the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
  - a. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
  - b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
8. The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7 above) to the Regional Office listed on the front of this permit within 30 days. Deviations from permit requirements, including those previously reported under F.7 above, shall be included in the semiannual report required by F.6 [Sections 1b-V, 3 and 4 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26].
9. Pursuant to 401 KAR 52:030, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit in accordance with the following requirements:
  - a. Identification of each term or condition;
  - b. Compliance status of each term or condition of the permit;
  - c. Whether compliance was continuous or intermittent;
  - d. The method used for determining the compliance status for the source, currently and over the reporting period.
  - e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

## **SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)**

- f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications shall be mailed to the following addresses:

Division for Air Quality  
Florence Regional Office  
8020 Veterans Memorial Drive  
Suite 110  
Florence, KY 41042

Division for Air Quality  
Central Files  
200 Fair Oaks Lane, 1<sup>st</sup> Floor  
Frankfort, KY 40601

10. In accordance with 401KAR 52:030, Section 3(1)(d), the permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KYEIS emission survey is mailed to the permittee. If a KYEIS emission survey is not mailed to the permittee, then the permittee shall comply with all other emission reporting requirements in this permit.
11. The Cabinet may authorize the temporary use of an emission unit to replace a similar unit that is taken off-line for maintenance, if the following conditions are met:
- a. The owner or operator shall submit to the Cabinet, at least ten (10) days in advance of replacing a unit, the appropriate Forms DEP7007AI to DD that show:
    - (1) The size and location of both the original and replacement units; and
    - (2) Any resulting change in emissions;
  - b. The potential to emit (PTE) of the replacement unit shall not exceed that of the original unit by more than twenty-five (25) percent of a major source threshold, and the emissions from the unit shall not cause the source to exceed the emissions allowable under the permit;
  - c. The PTE of the replacement unit or the resulting PTE of the source shall not subject the source to a new applicable requirement;
  - d. The replacement unit shall comply with all applicable requirements; and
  - e. The source shall notify Regional office of all shutdowns and start-ups.
  - f. Within six (6) months after installing the replacement unit, the owner or operator shall:
    - (1) Re-install the original unit and remove or dismantle the replacement unit; or
    - (2) Submit an application to permit the replacement unit as a permanent change.

**SECTION G - GENERAL PROVISIONS****1. General Compliance Requirements**

- a. The permittee shall comply with all conditions of this permit. A noncompliance shall be a violation of 401 KAR 52:030 Section 3(1)(b) and a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act). Noncompliance with this permit is grounds for enforcement action including but not limited to the termination, revocation and reissuance, revision, or denial of a permit [Section 1a-2 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26].
- b. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a-5 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26].
- c. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:030 Section 18. The permit will be reopened for cause and revised accordingly under the following circumstances:
  - (1) If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:030 Section 12;
  - (2) The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
  - (3) The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

- d. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the conditions of this permit [Sections 1a- 6 and 7 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26].
- e. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division [401 KAR 52:030 Section 3(1)(c)].

**SECTION G - GENERAL PROVISIONS (CONTINUED)**

- f. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority [401 KAR 52:030 Section 7(1)].
- g. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-11 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26].
- h. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26].
- i. Except for requirements identified in this permit as state-origin requirements, all terms and conditions shall be enforceable by the United States Environmental Protection Agency and citizens. [Section 1a-12-b of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26].
- j. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038 Section 3(6) [Section 1a-9 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26].
- k. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:030 Section 11(3)].
- l. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 26].
- m. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Cabinet or any other federal, state, or local agency.
- n. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry.
- o. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

- p. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.
- q. Pursuant to 401 KAR 52:030, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with:
  - (1) Applicable requirements that are included and specifically identified in this permit; and
  - (2) Non-applicable requirements expressly identified in this permit.

### 2. Permit Expiration and Reapplication Requirements

- a. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:030 Section 12].
- b. The authority to operate granted through this permit shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:030 Section 8(2)].

### 3. Permit Revisions

- a. Minor permit revision procedures specified in 401 KAR 52:030 Section 14(3) may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:030 Section 14(2).
- b. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

**SECTION G - GENERAL PROVISIONS (CONTINUED)****4. Construction, Start-Up, and Initial Compliance Demonstration Requirements**

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the construction of the equipment described herein, emission points 01, 02, 03, 04, and 05 in accordance with the terms and conditions of this permit.

- a. Construction of any process and/or air pollution control equipment authorized by this permit shall be conducted and completed only in compliance with the conditions of this permit.
- b. Within thirty (30) days following commencement of construction and within fifteen (15) days following start-up and attainment of the maximum production rate specified in the permit application, or within fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish to the Regional Office listed on the front of this permit in writing, with a copy to the Division's Frankfort Central Office, notification of the following:
  - (1) The date when construction commenced.
  - (2) The date of start-up of the affected facilities listed in this permit.
  - (3) The date when the maximum production rate specified in the permit application was achieved.
- c. Pursuant to 401 KAR 52:030, Section 3(2), unless construction is commenced within eighteen (18) months after the permit is issued, or begins but is discontinued for a period of eighteen (18) months or is not completed within a reasonable timeframe then the construction and operating authority granted by this permit for those affected facilities for which construction was not completed shall immediately become invalid. Upon written request, the Cabinet may extend these time periods if the source shows good cause.
- d. For those affected facilities for which construction is authorized by this permit, a source shall be allowed to construct with the final permit. Operational or final permit approval is not granted by this permit until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055. If compliance is not demonstrated within the prescribed timeframe provided in 401 KAR 50:055, the source shall operate thereafter only for the purpose of demonstrating compliance, unless otherwise authorized by Section I of this permit or order of the Cabinet.
- e. This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance demonstration on the affected facilities in accordance with 401 KAR 50:055, General compliance requirements. Testing must also be conducted in accordance with General Provisions G.5 of this permit.
- f. Terms and conditions in this permit established pursuant to the construction authority of 401 KAR 51:017 or 401 KAR 51:052 shall not expire.

**SECTION G - GENERAL PROVISIONS (CONTINUED)****5. Testing Requirements**

- a. Pursuant to 401 KAR 50:045 Section 2, a source required to conduct a performance test shall submit a completed Compliance Test Protocol form, DEP form 6028, or a test protocol a source has developed for submission to other regulatory agencies, in a format approved by the cabinet, to the Division's Frankfort Central Office a minimum of sixty (60) days prior to the scheduled test date. Pursuant to 401 KAR 50:045, Section 7, the Division shall be notified of the actual test date at least Thirty (30) days prior to the test.
- b. Pursuant to 401 KAR 50:045 Section 5, in order to demonstrate that a source is capable of complying with a standard at all times, any required performance test shall be conducted under normal conditions that are representative of the source's operations and create the highest rate of emissions. If [When] the maximum production rate represents a source's highest emissions rate and a performance test is conducted at less than the maximum production rate, a source shall be limited to a production rate of no greater than 110 percent of the average production rate during the performance tests. If and when the facility is capable of operation at the rate specified in the application, the source may retest to demonstrate compliance at the new production rate. The Division for Air Quality may waive these requirements on a case-by-case basis if the source demonstrates to the Division's satisfaction that the source is in compliance with all applicable requirements.
- c. Results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days or sooner if required by an applicable standard, after the completion of the fieldwork.

**6. Acid Rain Program Requirements**

- a. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

**7. Emergency Provisions**

- a. Pursuant to 401 KAR 52:030 Section 23(1), an emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
  - (1) An emergency occurred and the permittee can identify the cause of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,
  - (4) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken.



## SECTION G - GENERAL PROVISIONS (CONTINUED)

- (5) Notification of the Division does not relieve the source of any other local, state or federal notification requirements.
- b. Emergency conditions listed in General Provision G.7.a above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:030 Section 23(3)].
- c. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:030 Section 23(2)].
8. Ozone depleting substances
- a. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- (1) Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
  - (2) Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
  - (3) Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
  - (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.
  - (5) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
  - (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- b. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.
9. Risk Management Provisions
- a. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:
- RMP Reporting Center  
P.O. Box 1515  
Lanham-Seabrook, MD 20703-1515.
- b. If requested, submit additional relevant information to the Division or the U.S. EPA.

**SECTION H - ALTERNATE OPERATING SCENARIOS**

N/A

**SECTION I - COMPLIANCE SCHEDULE**

N/A